

**REMARKS**

Claims 1-10 stand rejected under 35 U.S.C. § 103(a) as being obvious over Yamamoto et al. (JP 3-232274) in view of Kim (US 6,052,169). Applicants respectfully traverse the rejection as being based upon a combination of references that neither teaches nor suggests the novel combination of features recited in independent claim 1, and hence dependent claims 2-10.

Initially, Applicants again respectfully submit that since the Examiner has failed to provide any specific correspondence between each of the individual features recited by independent claim 1 and each of the individual features explicitly shown and distinctly labeled in FIGs. 27-33 of Yamamoto et al., Applicants find it difficult, at best, to address the allegations set forth by the Examiner. As set forth in MPEP 706.02, (entitled “Reliance Upon Abstracts and Foreign Language Documents In Support of a Rejection”), “[i]f the document is in a language other than English and the examiner seeks to rely on that document, a translation must be obtained so that the record is clear as to the precise facts the examiner is relying upon in support of the rejection.” Accordingly, Applicants again respectfully request that in the event that the present rejection in view of Yamamoto et al. is maintained, the Examiner provide an English-language translation of Yamamoto et al. as well as some type of specific identification of the features disclosed by Yamamoto et al. that allegedly anticipate the features of independent claim 1, and hence dependent claims 2-10. Furthermore, Applicants respectfully again request that if the rejection is maintained and an English-language translation of Yamamoto et al. is provided to Applicants, that the next Office Action is not made final so as to give Applicants a fair opportunity to respond to the next Office Action.

The Office Action acknowledges that Yamamoto et al. “fails to disclose the required pad and driving/gate/data/signal line relationship.” Thus, the Office Action relies upon Kim for allegedly teaching “a liquid crystal display device having an equipotential electrode structure where in Figs. 1-4, the required pad and driving/gate/data/signal line relationship configuration is disclosed.” Accordingly, the Office Action concludes that “[i]t would have been obvious to one of having ordinary skill in the art at the time the invention was made to include the required pad and driving/gate/data/signal line relationship in Yamamoto et al. as taught by Kim in order to have a liquid crystal display device with increased reliability.” Applicants respectfully disagree.

First, Applicants respectfully assert that Kim actually teaches, in FIG. 2, for example, first lead portions (within the segment electrode driving circuit regions 14, 16, and 18) extending at a first angle and second lead portions (lead parts 10) interconnecting the first lead portions and the drive lines (common electrodes 60 and segment electrodes 80, in FIGs. 3 and 4) extending at a second angle different from the first angle. Thus, Applicants respectfully submit that Kim fails to teach or suggest the structures and methods recited by each of claims 1 and 6, and hence dependent claims 2-5 and 7-10.

Second, Applicants respectfully assert that the alleged motivation to combine the teachings of Yamamoto et al. and Kim is nowhere to be found in either of Yamamoto et al. or Kim. Specifically, Applicants respectfully assert that neither Yamamoto et al. nor Kim teach or suggest a plurality of pads and pad lines (i.e., “the required pad and driving/gate/data/signal line relationship,” as set forth by the Office Action) for providing “increased reliability.”

Accordingly, since Kim fails to provide any motivation to modify the teachings of Yamamoto et al., as best understood by the limited disclosure provided with the Office Action, Applicants

respectfully assert that the Office Action fails to establish a *prima facie* case of obviousness with regard to independent claims 1 and 6, and hence dependent claims 2-5 and 7-10, respectively.

For at least the above reasons, Applicants respectfully assert that claims 1-10 are allowable over Yamamoto et al. and Kim for at least the reasons set forth above. Thus, Applicants respectfully request that the rejections of claims 1-10 under 35 U.S.C. § 103(a) be withdrawn.

### **CONCLUSION**

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration and the timely allowance of the pending claims. Should the Examiner believe that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicants' undersigned representative to expedite prosecution.

If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-0310. If a fee is required for an extension of time under 37 C.F.R. § 1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,

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